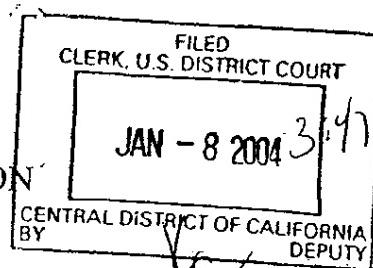


## **Exhibit F**

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10 Attorneys for Plaintiff  
11 ACACIA MEDIA TECHNOLOGIES CORPORATION



8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA  
10 SOUTHERN DIVISION

11  
12 ACACIA MEDIA TECHNOLOGIES  
13 CORPORATION,

14 Plaintiff,

15 vs.

16 NEW DESTINY INTERNET GROUP,  
17 et. al.,

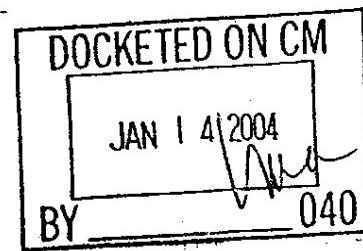
18 Defendants.

19 AND ALL RELATED CASE ACTIONS.

20 Case No. SACV 02-1040 JW (MLGx)

21 PLAINTIFF ACACIA MEDIA  
22 TECHNOLOGIES  
23 CORPORATION'S CLAIM  
24 CONSTRUCTION BRIEF

25 DATE: February 6, 2004  
26 TIME: 10:00 a.m.  
27 CTRM: Hon. James Ware



W4

28 Case No. SACV 02-1040 JW (MLGx)

PLAINTIFF ACACIA MEDIA TECHNOLOGIES  
CORPORATION'S CLAIM CONSTRUCTION BRIEF

1                   **2. The Meaning Of The Phrase “Items Having Information”**

2                   There is no material difference between the phrases “items containing  
3 information” (from claim 1) and “items having information” from claim 41. As  
4 previously discussed, the phrase “items having information” is construed as “units or  
5 members of a group or groups which have information. Information is the meaning  
6 assigned to data by known conventions.” (‘992 patent, 6:12-15 and 6:19-22)

7                   **3. The Meaning Of The Phrase “Source Material Library”**

8                   The term “source” has a relevant dictionary definition: “**1 b (1):** a point of  
9 origin or procurement: beginning.” (Webster’s, at 1127; Exhibit 12). The term  
10 “material” has a relevant dictionary definition: “**1 a (1):** relating to, derived from, or  
11 consisting of matter. . . **3 b:** relating to or concerned with physical rather than spiritual  
12 or intellectual things.” (Webster’s, at 733; Exhibit 12). The term “library” has a  
13 relevant dictionary definition: “**1 a:** a place in which literary, musical, artistic, or  
14 reference materials (as books, manuscripts, recordings, or films) are kept for use, but  
15 not for sale **b:** a collection of such materials.” (Webster’s, at 688; Exhibit 12). Thus,  
16 the phrase “source material library” is construed as: “a place where source material is  
17 kept or a collection of source material. Source material are physical things at the  
18 point of origin or procurement.”

19                   **4. Conclusion -- The Meaning Of The Phrase “Storing Items  
20                   Having Information In A Source Material Library”**

21                   Pursuant to the above, the phrase “storing items having information in a source  
22 material library” is construed as:

23                   the act of placing items having information in a source  
24 material library for later use where a source material library  
25 is a place where source material is kept or a collection of  
26 such material, source material are physical things at the  
27 point of origin or procurement, items having information are  
28 units or members of groups which have information, and  
information is any meaning assigned to data by known  
conventions.